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IN RE

TRANSITION FROM TTY TO REAL-TIME TEXT TECHNOLOGY
&
PETITION FOR RULEMAKING
TO UPDATE THE COMMISSION'S RULES FOR ACCESS
TO SUPPORT THE TRANSITION
FROM TTY TO REAL-TIME TEXT TECHNOLOGY,
AND PETITION FOR WAIVER
OF RULES REQUIRING SUPPORT OF TTY TECHNOLOGY

ON PETITION FOR CLARIFICATION
OR, IN THE ALTERNATIVE, RECONSIDERATION

COMMENTS OF THE
NATIONAL EMERGENCY NUMBER
ASSOCIATION

TELFORD E. FORGETY, III
Government Affairs Director

1700 Diagonal Road, Ste. 500
Alexandria, VA 22314
(202) 618-6369

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Before the Federal Communications Commission

CG Docket № 16-145 – GN Docket № 15-178

In re

TRANSITION FROM TTY TO REAL-TIME TEXT TECHNOLOGY
&
PETITION FOR RULEMAKING
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COMMENTS OF THE
NATIONAL EMERGENCY NUMBER ASSOCIATION

NENA: The 9-1-1 Association respectfully submits the following comments in response to the *Public Notice* released by the Consumer and Governmental Affairs Bureau on February 27th, 2017, in the above-captioned proceeding.

COMMENTS

T-Mobile is correct that carriers cannot convert RTT traffic to TTY after it has been handed-off to an ESInet.

NENA agrees completely with the Commission's conclusion in the Real-Time Text (RTT) Report & Order (R&O) that providing media, signaling, and location data to Public Safety Answering Points are core carrier obligations with respect to 9-1-1 "calls," of all types. However, after carefully reviewing T-Mobile's *Petition*, we are convinced that, in one narrow case, transcoding of RTT to TTY should *not* be the responsibility of an originating service provider or access network provider.

T-Mobile cabins its request to a single interconnection scenario: a direct, IP/SIP/RTT connection between a carrier network and an Emergency Services IP network or "ESInet."[1] In this circumstance, the hand-off between the access network provider (ANP) and the terminating ESInet is the last point at which an ANP has access to, or control of, the signaling, media, or additional data associated with an NG9-1-1 RTT "call."[2] Every PSAP served by an ESInet depends on the NG9-1-1 functional entities within that network to provide any protocol translations or interworking required to service that PSAP's capabilities.[3] As T-Mobile correctly notes, it would be difficult, if not impossible, for an ANP to insert its own systems between a terminating ESInet and a legacy PSAP.[4] Doing so would require a novel call-routing mechanism, or would require a carrier to pay for all or part of the costs of installing and maintaining a Legacy PSAP Gateway (LPG). Beyond the technical and practical infeasibility of

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[1] T-Mobile, *Petition for Clarification or, in the Alternative, Reconsideration* at 3 (Feb. 22, 2017).

[2] NENA: The 9-1-1 Association, *Detailed Functional and Interface Specifications for the NENA i3 Solution* at 103 (Sep. 10, 2016) (*available at:* http://www.nena.org/?page=i3_Stage3).

[3] *Id.* at 56.

[4] T-Mobile, *supra* note 1, at 4.

such an arrangement, introducing such a requirement could actually create a perverse incentive: PSAPs that would otherwise bear the cost of maintaining an LPG after their state or region had fully transitioned to NG9-1-1 could rely on an ANP that has already upgraded to IP/SIP/RTT to pay their way. NENA does not support such an arrangement.

Although NENA fully supports T-Mobile's petition for the interconnection scenario it describes, we express caution that there may be transitional scenarios in which an ANP's transcoding obligations remain in place, even where an ESInet otherwise exists.

For example, some PSAPs may transition to NG9-1-1 gradually, maintaining legacy analog or Time-Division-Multiplexed (TDM) connections to a Selective Router (SR) even while they are connected to an ESInet for some purposes. Similarly, some NG9-1-1 system service providers may elect to keep in-place legacy Selective Routers to serve as temporary points of aggregation until full IP-to-IP interconnection can be negotiated with all or most of the parties providing NG9-1-1 service to consumers in a given area. In these cases, the mere existence of an ESInet should not relieve an ANP or OSP of its obligation to transcode TTY to RTT for delivery over legacy network components.

Only when PSAPs served by transitional arrangements *request* that the point of interconnection between their serving ESInet and an ANP or OSP shift to the ESInet's Border Control Function should an ANP or OSP be permitted to satisfy its obligation solely by delivering traffic to the BCF. NENA does not anticipate that such arrangements will be especially common or long-lived. However, as part of our commitment to a PSAP-led transition, we cannot rule-out their existence entirely. Provided the Commission is careful to recognize these important exceptions, we support T-Mobile's petition.

CONCLUSION

The petition for clarification should be granted.

TELFORD E. FORGETY, III
Attorney